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2-15-06

February 15, 2006

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

RE: Monthly Reports: No. 116, January 2006
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Asarco is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. The report is organized to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script that reads "K. Aldrich for".

Thomas L. Aldrich
V.P., Environmental Affairs

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Glen Vadera - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay



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Monthly Report No. 116, January 2006
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A. Actions taken to achieve compliance with the Consent Decree during the previous month.

1. A regular monthly design review meeting was not held in January.
2. Remedial Design continued. Remaining design elements are incorporated into the Tacoma Upland Remediation Design – Grade and Cap Site and Breakwater Peninsula.
3. Remedial Action activities continued.

B. Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.

1. Outfall activities including the following:

Section 2.6.1 of the Statement of Work (SOW) requires Asarco to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm. EPA and Asarco met on April 17, 2003 to discuss monitoring at the Tacoma Smelter site. The following changes to the outfall monitoring program were agreed to on an interim bases:

Sampling at the Middle Outfall was discontinued. Flows to this outfall have been re-routed to the North Outfall. Remaining seepage out of the Middle Outfall is too low to measure and does not provide accurate water quality results. Sampling at the North and South outfalls will continue through RA. Weekly composite samples (instead of daily composite samples) will be collected at each of these outfalls during the construction season. During the winter season, outfall samples will be collected every other month. The following schedule began in May of 2003. Weekly composite samples will be collected during the following months: May-October, December, February, and April. Results for samples collected in December are attached. There was an exceedance for As (1.68 mg/L), Cu (2.23 mg/L) and Zinc (0.88 mg/L) during the week of November 28 – December 5 likely due to heavy rains during that period of time.

B. Work Plans and other deliverables completed and submitted during the previous month.

1. No new comments were received from EPA during the month of January.
2. Final Smelter site remediation design continued in January.
3. Remedial Action during January included the following tasks:
 - OCF construction activities:
 - Asarco notified EPA verbally that the lower vault of OCF had a leak and groundwater/surface water was collecting in the vault. A pump was mobilized to the site to remove the water from the vault and inspections were made to determine the source of the leak.

Monthly Report No. 116, January 2006
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- Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary Baker storage tank.
- Source Area construction activities:
 - Maintained erosion and surface water controls
- Site Capping construction activities:
 - Maintained subgrade areas at the site
- Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
- Water Treatment System:
 - Continued to collect water in baker tank for offsite disposal

D. Actions scheduled for the next six weeks.

1. Remedial design will continue.
2. Asarco expects to receive comments from EPA on the following submittals:
 - None expected.
3. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - Semi-annual monitoring will be completed in March
 - OCF construction activities:
 - Continue collection of leachate in baker tank for offsite disposal
 - Continue monitoring of leachate volumes
 - Continue to resolve leak in lower vault
 - Source Area construction activities:
 - Erosion controls and site maintenance
 - Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
 - Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite
 - Water Treatment System:
 - Continue to collect leachate in baker tank for offsite disposal

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Group 1 Preliminary Design tasks are 100% complete; Intermediate Design is 100% complete; Final Design is about 98% complete.
2. Group 2 Preliminary Design is about 100% complete; Intermediate Design is essentially complete, Final Design is about 95% complete.
3. Surface water evaluation is about 98% complete.

Monthly Report No. 116, January 2006
Operable Unit 02
Asarco Tacoma Smelter Site

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. Schedule revisions may be necessary because the RD schedule in the Remedial Design Reports (RDRs) anticipated Consent Decree lodging in April 1996. The current RD Schedule (Final Revision 1) was prepared in September 1996 and is part of the RD Work Plan.
2. Asarco is currently working per Revision 8 of the RD schedule as discussed with EPA during the May 23, 2000 RD meeting.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Meetings held in January:
 - Asarco attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA activities (1st and 3rd Monday of each month).

Table 1. Summary of December 2005 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.516	103.20%	0.648	129.50%	0.050	10.00%
North Outfall	0.069	13.85%	0.093	18.50%	0.015	3.00%

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.